



THE CITY OF NEW YORK  
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*Via ECF*

The Honorable Katherine Polk Failla  
United States District Court for the  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Azor-El, et al. v. City of New York, et al., Case Nos. 20 CV 3650, 20 CV 3978, 20 CV 3980, 20 CV 3981, 20 CV 3982, 20 CV 3983, 20 CV 3985, and 20 CV 3990**

Dear Judge Failla:

We represent the Defendants in the above-referenced consolidated actions and write in response to Plaintiffs' letter of today, seeking an order concerning the scheduling of inmates for interviews by Plaintiffs' counsel. As with prior applications of Plaintiffs' counsel, this has been filed without advising us of the issue in advance and allowing us to try to resolve it without the necessity of Court action. Even more confounding, we were scheduled to meet on scheduling matters at 4:30 p.m. today, only an hour after this was filed. We have now met and advised counsel that attorney-client calls are not in fact recorded, and we will look into their other logistical issues with an eye towards resolving them.

Therefore, we respectfully ask the Court to defer ruling on this application until we are able to follow up with our client and try to work this issue out. We do ask that counsel be reminded again about the practice in this Court that the parties' representatives cooperate with each other to work out problems and to give appropriate notice to Defendants' counsel when seeking Court intervention, so that the Court need not be burdened with unnecessary applications.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer  
*Assistant Corporation Counsel*

/s/ Chlarens Orsland

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cc: ***Via ECF***  
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